

Ryan Dwight O'Quinn, Esq.
O'Quinn Stumphauzer & Sloman
SunTrust International Center
1 SE 3rd Avenue, Suite 1820
Miami, FL 33131
Tel: (305) 371-9686
Attorney for Defendant Andrew Levine

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHAEL LAFONTANT,	:	
Plaintiff,	:	
v.	:	Case No. 14-CV-9895-CS
WASHINGTON SQUARE FINANCIAL, LLC	:	NOTICE OF MOTION TO
d/b/a IMPERIAL STRUCTURED SETTLEMENTS,	:	DISMISS OR STAY
IMPERIAL FINANCE & TRADING, LLC,	:	PENDING ARBITRATION
IMPERIAL HOLDINGS INC., and	:	
ANDREW LEVINE,	:	
Defendants,	:	

PLEASE TAKE NOTICE that upon all of the prior pleadings and proceedings heretofore had herein, defendant Andrew Levine, by and through his undersigned attorney, will move this Court before the Honorable Cathy Seibel, at the Honorable Charles L. Brieant Jr. Federal Building and Courthouse, 300 Quarropas Street, White Plains, New York 10601-4150, at a date to be scheduled by the Court for an order to dismiss or stay Plaintiff's claims in the instant action pending the completion of arbitration, and to grant such other relief as the Court may deem just and proper, including costs.

Dated: Miami, Florida
June 10, 2015

Respectfully Submitted,



Ryan Dwight O'Quinn, Esq.
O'Quinn Stumphauzer & Sloman
Attorney for Defendant Andrew Levine
One SE Third Avenue, Suite 1820
Miami, Florida 33131
Tel: (305) 371-9686
Fax: (305) 371-9687
roquinn@osslaw.com

O'QUINN STUMPHAUZER & SLOMAN
ONE SE THIRD AVE., STE 1820, MIAMI, FL 33131